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November 28, 2011

The Honorable John Gleeson
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Chambers 727S
Brooklyn, New York 11201

Re: KAN Trading Ltd. v. Connoisseur Int'l, et al.
Case No. 10-cv -4774 (JG)

Dear Judge Gleeson:

We represent the Plaintiff in the referenced action. We write pursuant to the Court's October 21, 2011 Order (the "Order").

The parties have exchanged drafts of the settlement documents. The process is not yet complete. Some delay has been due on Plaintiff's side the Plaintiff representative's extensive travel in East Asia. We expect the documentation to be completed and executed within the next 30 days.

Because the settlement contemplates use of a Consent Judgment to be entered in the event of a default of the settlement agreement, it is once again respectfully requested that any dismissal order expressly provide that the action may be re-opened upon filing by Plaintiff's counsel of a declaration of default for the purpose entry of the Consent Judgment.

The parties thank the Court for its continued assistance in the resolution of this dispute.

Respectfully,

/s/

PETER JAKAB

cc: Andrew Saulitis, Esq. (via ECF)